

Steven C. Wolan (State Bar No. 56237)
Andrea S. Carlise (State Bar No. 151648)
PATTON ♦ WOLAN ♦ CARLISE, LLP
1814 Franklin Street, Suite 501
Oakland, California 94612
Telephone: (510) 987-7500
Facsimile: (510) 987-7575

Attorneys for Defendants,
COUNTY OF CONTRA COSTA,
CONTRA COSTA COUNTY IN-HOME SUPPORT
SERVICES PUBLIC AUTHORITY
(incorrectly sued herein as IHSS PUBLIC AUTHORITY),
and JOHN COTTRELL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GLORIA DELLAFOSSE,

Case NO. C 07 3948

Plaintiff,

vs.

COUNTY OF CONTRA COSTA, IHSS PUBLIC
AUTHORITY, JOHN COTTRELL,
EXECUTIVE DIRECTOR, DOES 1 to 100,

DEFENDANTS' REQUEST FOR JUDICIAL
NOTICE IN SUPPORT MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM UPON
WHICH RELIEF CAN BE GRANTED (FRCP
12(b)(6)), AND IN THE ALTERNATIVE,
MOTION FOR SUMMARY JUDGMENT (FRCP
56) OR MOTION FOR A MORE DEFINITE
STATEMENT

Defendants.

Date: March 21, 2008

Time: 9:00 a.m.

Courtroom: 7, 19th Floor

Judge: The Hon. Maxine M. Chesney

TO THE COURT, ALL PARTIES IN THIS ACTION AND THEIR COUNSEL OF RECORD
HEREIN:

PLEASE TAKE NOTICE that Defendants COUNTY OF CONTRA COSTA, CONTRA COSTA
COUNTY IN-HOME SUPPORT SERVICES PUBLIC AUTHORITY, (incorrectly sued herein as IHSS
PUBLIC AUTHORITY) and JOHN COTTRELL (collectively "defendants") hereby request pursuant to

1 Rule 201 of the Federal Rules of Evidence, that the Court take judicial notice of the following documents
2 which are public records:

- 3 1. Contra Costa County Code, Title 5, Chapter 55-2, Ordinance No. 98-14, passed on March 18,
4 1998, attached hereto as Exhibit A.
- 5 2. Plaintiff's DFEH Complaints of Discrimination dated August 5, 2005 and June 2, 2006,
6 attached hereto as Exhibit B.
- 7 3. The right-to-sue letters from the DFEH to Plaintiff dated May 12, 2006 and June 9, 2006,
8 attached hereto as Exhibit C; and
- 9 4. The right-to-sue letters from the EEOC to Plaintiff dated April 24, 2007 and June 13, 2006,
10 attached hereto as Exhibit D.

11 Dated: February 15, 2008

Respectfully submitted,

12 PATTON ♦ WOLAN ♦ CARLISE, LLP

13
14 by: 

15 STEVEN C. WOLAN
16 ANDREA S. CARLISE
17 Attorneys for Defendants,
18 COUNTY OF CONTRA COSTA,
19 CONTRA COSTA COUNTY IN-HOME
20 SUPPORT SERVICES PUBLIC AUTHORITY
21 (incorrectly sued herein as IHSS PUBLIC
22 AUTHORITY), and JOHN COTTRELL
23
24
25
26
27
28